

Application No. 09/892,733  
Response dated February 6, 2007  
Office Action dated December 6, 2006

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REMARKS/ARGUMENTS

Claims 1-28 are pending in the application. Claims 1-6, 11-19, and 24-28 are rejected under 35 U.S.C. §102(b) as being anticipated by Unger et al. (U.S. Patent No. 5,991,713). Claims 7 and 20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Unger, in view of Povilus (U.S. Patent No. 5,740,425). Claims 8 and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Unger in view of Chanod et al (U.S. Patent No. 6,393,389). Claims 9 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Unger in view of Anderson (U.S. Patent No. 6,021,202). Claims 10 and 23 are rejected under 35 U.S.C. 103(a) as being unpatentable over Unger in view of Burrows et al (U.S. Patent No. 5,963,954).

Applicants respectfully submit that the cited references do not teach, suggest or describe at least “[a] method for content based HyperText Markup Language (HTML) coding comprising: accessing source HTML data; *simplifying* the HTML data, the *simplifying* minimizing the size of the HTML data, *knowledge of the HTML data being used during the simplification*; encoding the simplified HTML data; and storing the encoded HTML data” (e.g., as described in claim 1).

The Office Action asserts Unger teaches the relevant limitations in it describes a compiler that parses a hypertext file to separate tags from text, and compresses and stores the text, citing col. 8 lines 35-53 and col. 8 line 55. See Office Action dated 7/28/2004, paragraph 3-1 and Office Action dated 12/6/2006, paragraph 6-1. The Office Action further cites column 8, lines 25-31 as describing the compressing, storing and transmitting of natural language text, including HTML files identified by the author. See Office Action dated 12/6/2006. Applicants respectfully disagree, and submit the cited sections fail to describe the relevant limitations.

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The cited section column 8, lines 25-31 states:

In step 200, the author identifies the hypertext objects for compilation as those within the boundary 40, selected for their relevance to the common subject of baseball players. The author can identify files for compilation to the compiler in various ways, including by supplying the compiler with their hypertext addresses (for example URLs of the HTML files).

The cited section is directed to compiling, and more specifically, to the compiling of hypertext objects. The author may identify files for compilation, including supplying hypertext addresses.

Applicants submit the cited section fails to describe *simplification* as described in embodiments of the present application. Compiling data is well understood by one of ordinary skill in the art as being the process of converting source code to object code in preparation for execution. Compiling data is not the same as simplifying data (as described in claim 1).

The Unger reference does not describe *simplification* anywhere. The second cited section, column 8, lines 35-53, states:

In step 202 the compiler retrieves each file. The retrieval process includes fetching each object identified to the compiler, and in addition, fetching required objects that are referenced by tags within those files. These referenced files will frequently be either other hypertext files or object files representing a stored picture, video, or sound.

In step 204, the compiler parses the hypertext file in order to separate the tags from the corresponding text and objects. A correspondence table is created to preserve the relationship between the tags and the corresponding text and objects.

In steps 206 through 214 the compiler compresses the text contained within the files and stores the compressed text in accordance with a preferred method of compression and storage detailed below. Although the compression method set forth below is preferred, for purposes of compressing the compiled file, compression may be performed with any suitable technique including: Huffman, Lempel-Ziv or simple run-length encoding.

The first paragraph describes the retrieval process of different data objects, including hypertext files or object files ("step 202"). The second paragraph describes the compiler's parsing process, wherein the compiler separates tags from corresponding text and object files ("step 204").

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Applicants submit this paragraph does not describe the minimization of the actual data *itself*, but merely the associated tags necessary to format and facilitate the HTML code. The separation of the tags does not simplify the data itself, as described in the embodiment of independent claim 1. For at least the reasons described above, this compilation is not the same as simplification.

The third paragraph describes compression as described in Unger ("step 206"). There is no mention of the minimization of the *actual* HTML data in this section, but rather a global compression of the unaltered data. Unger further describes various known techniques to achieve compression.

First, Applicants disagree with the Office Action's implication that simplification is the same as compression. Compression does not *simplify* the data, but rather attempts to preserve data as exactly as possible in a compressed form. Simplification, on the other hand, implies actual alteration of the data *itself*. Such simplification may be accomplished, for example, by removal of spaces from the HTML data (*e.g.*, claim 5), removal of comments from the HTML data (*e.g.*, claim 6), normalizing the case of text in the HTML data (*e.g.*, claim 7), or encoding multiple characters in the HTML data into a single byte (*e.g.*, claim 10). The compression process described in Unger is not the same as simplification as described in embodiments of the present application.

The cited sentence column 8, line 55, stating "Compression and Storage Methods", fails to describe at least simplification as described in the embodiments of the present application for similar reasons to those discussed above.

Lastly, the Office Action cites to column 11, lines 55-59 of Unger. The cited section states:

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In most cases for moderately sized files (several dozen pages of text at least) files compressed using the techniques described above are typically 2 to 10 times smaller than the input source file that they were generated from.

This cited section is directed toward compression, not simplification. Again, compression fails to describe the relevant limitations of claim for at least the reasons described above.

Povilus fails to make up for the deficiencies of Unger. Povilus is directed to a "pre-compile" process that entails normalizing SKU tables and schemes to compress data. Povilus also describes the removal of data as part of a "capture" process. Examples of the type of capture process data removed include realm column information and binder page reference numbers. However, Povilus does not describe the simplification of the actual data *itself*.

Similarly, Burrows fails to make up for the deficiencies of Unger. The cited sections of Burrows are not directed to simplification, but rather towards determining and maintaining locations of words in a given data set, wherein a sequence of pairs are used to denote the locations of the words (lines 44-46, "The parsing module produces a sequence of pairs 500 in a collating order according to the locations of the words 300 of the various pages 200"). The cited section of Burrows is inapplicable as it is not directed towards simplification during content based HTML coding.

Chanod also fails to make up for the deficiencies of Unger. Although Chanod does describe the manipulation of tokens and the removal of HTML tags, it is directed towards translation between two languages, and not simplification. Moreover, Chanod does not disclose *simplification* of the data itself as found in embodiments of the present invention.

Lastly, Anderson fails to make up for the deficiencies of Unger as well. The cited section of Anderson states:

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The FSML documents are ASCII documents that are both human readable and machine readable and processable. ASCII encoding of data items provides integer, hex, real, string and boolean types. Tags and values are readable without special software. SGML escape sequences permit internationalization. ASCII formats are compatible with electronic mail transaction as well as with V.42bis and other data compression.

The cited section is not directed to simplification as described in claimed embodiments of the present application, and Applicants submit the Anderson reference as a whole fails to describe at least the relevant limitations argued above.

Therefore, since each and every limitation of independent claim 1 is not found in the cited reference, the 35 U.S.C. §102(b) rejection should be withdrawn and claim 1 should be allowed. Independent claims 13 and 17 contain similar allowable limitations, and therefore should be allowed as well. Claims 2-12, 14-16, and 18-28 depend from allowable base claims and therefore are allowable as well.

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For at least all the above reasons, the Applicants respectfully submit this application is in condition for allowance. A Notice of Allowance is earnestly solicited.

The Examiner is invited to contact the undersigned at (408) 975-7500 to discuss any matter concerning this application. The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 11-0600.

Respectfully submitted,  
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